

BIG HORN COUNTY ELECTRIC

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Hardin, Montana 59034-0410

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7 November 2000

FEDERAL ENERGY
REGULATORY
COMMISSION

Mr. David P. Boergers, Secretary
Federal Energy Regulatory Commission
888 First Street, N.E.
Washington, D.C. 20426

RE: AVISTA CORPORATION, THE BONNEVILLE POWER ADMINISTRATION, IDAHO POWER COMPANY, THE MONTANA POWER COMPANY, NEVADA POWER COMPANY, PACIFICORP, PORTLAND GENERAL ELECTRIC COMPANY, PUGET SOUND ENERGY, INC., AND SIERRA PACIFIC POWER COMPANY - PROPOSAL TO FORM A REGIONAL TRANSMISSION ORGANIZATION (REFERRED TO AS RTO WEST) IN COMPLIANCE WITH THE REQUIREMENTS OF ORDER 2000. DOCKET NO. RT01-35-000.

MOTION TO INTERVENE

Dear Mr. Boergers:

Pursuant to Rules 211 and 214 of the Rules of Practices and Procedures of the Federal Energy Regulatory Commission, 18 C.F.R. 385.211 and 385.214, Big Horn County Electric Cooperative, Inc., hereby submits this Motion to Intervene in the above-captioned proceeding. I have enclosed an original and fourteen (14) copies of our transmittal.

I respectfully request that copies of all notices and correspondence relating to this filing be sent to:

Howard G. Robinson
General Manager
Big Horn County Electric Cooperative, Inc.
303 South Mitchell
P.O. Box 410
Hardin, Montana 59404

(406) 665-2830

Sincerely,

Howard G. Robinson
Howard G. Robinson
General Manager

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Phone: (406) 665-2830

FAX: (406) 665-2644

**UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION**

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FEDERAL ENERGY
REGULATORY
COMMISSION

IN THE MATTER of AVISTA CORPORATION,)
BONNEVILLE POWER ADMINISTRATION, IDAHO)
POWER COMPANY, MONTANA POWER COMPANY,)
NEVADA POWER COMPANY, PACIFICCORP,)
PORTLAND GENERAL ELECTRIC COMPANY,)
PUGET SOUND ENERGY, INC., and SIERRA)
PACIFIC POWER COMPANY'S (collectively, the)
Filing Utilities) Supplemental Compliance Filing and)
Request for Declaratory Order Pursuant to Order 2000.)

DOCKET NO. RTO1-35-000

**MOTION TO INTERVENE and INITIAL COMMENTS
BY
BIG HORN COUNTY ELECTRIC COOPERATIVE, INC.**

Pursuant to Rules 211 and 214 of the Rules of Practices and Procedures of the Federal Energy Regulatory Commission ("Commission"), 18 C.F.R. 385.211 and 385.214, Big Horn County Electric Cooperative, Inc., referred to herein as "Big Horn", hereby submits this Motion to Intervene in the above-captioned proceeding. In support thereof, Big Horn respectfully states:

I.

1. Pursuant to Rule 2010 of the Commission's Rules and Practices and Procedures, the following individual is designated to receive service of all documents in this proceeding.

Howard G. Robinson
General Manager
Big Horn County Electric Cooperative, Inc.
303 South Mitchell
P.O. Box 410
Hardin, Montana 59404

II. INTERVENTION

2. Big Horn receives Network Transmission services from the Bonneville Power Administration – Transmission Business Line, referred to herein as BPA-TBL; and the Montana Power Company, referred to herein as MPC. Big Horn's current contracts with BPA-TBL and MPC provide for network transmission service for the delivery of electric energy and related ancillary services to our three points of interconnect with MPC's facilities. This action will impact Big Horn's tariffed rate for transmission services. As a result, Big Horn will be directly affected by the outcome of this proceeding.

3. On or about 23 October 2000, pursuant to Federal Energy Regulatory Commission (Commission's) Order 2000, and in accordance with 18 CFR 385.207(a)(2) the Filing Utilities tendered for filing with the Commission the aforementioned "Supplemental Compliance Filing and Request for Declaratory Order pursuant to Order 2000". This filing describes the Filing Utilities' proposal to form a regional transmission organization commonly referred to as "RTO West".

4. Given that BPA-TBL and MPC provide electric transmission and related ancillary services to Big Horn, we have a direct and substantial interest in the outcome of this proceeding. This interest cannot be adequately represented by the interest of any other party, and Big Horn will be bound by Commission action in this matter.

5. Big Horn has not yet had the opportunity to completely analyze the subject filing. However, based on our preliminary analysis, we have significant interest the Filing Utilities' efforts and feel compelled to take action in this proceeding focused on articulating the issues of particular interest to our cooperatives and the members we serve.

III. COMMENTS

6. Based on public information made available to affected transmission customers Big Horn applauds the intent of subject filing to impose just and reasonable rates for electric transmission and related services to our distribution cooperative member systems, and ultimately, to the consumers we serve at cost.

7. An over-arching concern of Big Horn is the fear of increased rates for electric transmission and related ancillary services despite the ostensible intent of Order 2000 to benefit all those who are captive customers of incumbent transmission service providers. Big Horn has followed the efforts of the Filing Utilities as they have engaged in the process that resulted in this filing and as late as 1 November 2000 our representative attended a public meeting hosted by BPA in Portland WA, designed to give an overview of the filing to the transmission customers they serve.

8. Big Horn looks forward to forthcoming details on how the respective RTO member systems overlay their current operating costs with the tariff algorithm contemplated by the collective group of Filing Utilities. Specifically, what will the savings be to the RTO West system customers when viewed in the context of existing tariffs and system reliability issues.

9. Big Horn looks forward as greater detail is revealed on how the RTO West proposal will fulfill the characteristics and functions envisioned under Order 2000. The measure of that success will be the resolution of a number of issues of particular importance to Montana. These issues center on such areas as tariff structure, system access and scheduling, conversion of existing contractual transmission rights, congestion management, participation by public power entities, retail access, resolution of stranded cost, and the dynamics of the new independent transmission company (representing the amalgamation of the investor owned utilities facilities) that will join as a single

transmission owner.

10. On the basis of these comments and others that will surface in the context of this proceeding Big Horn submits this Motion to Intervene.

IV

REQUEST TO ACCEPT THIS MOTION TO INTERVENE

WHEREFORE, for the reasons set forth herein, Big Horn County Electric Cooperative, Inc. respectfully requests an order from the Commission permitting Big Horn to intervene and to participate as a party with full rights in the above captioned proceeding.

Dated this 7th day of November 2000.

By: Howard G. Robinson

Howard G. Robinson
General Manager
Big Horn County Electric Cooperative, Inc.
303 South Mitchell
P.O. Box 410
Hardin, Montana 59404

(406) 665-2830

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